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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

KIMBERLEY MAIN, an individual, on behalf
 of herself and all others similarly situated,

Plaintiffs,

v.

WAL-MART STORES, INC., a Delaware
 corporation, and DOES 1 through 50 inclusive

Defendants.

Consolidated Case No. C 11-01919 JSW

Consolidated with:
 Case No. C 11-02001 JSW
 Case No. C 11-02893 JSW
 Case No. C 11-02659 JSW

CLASS ACTION

**JOINT STIPULATION TO SHORTEN
 TIME AND ~~[PROPOSED]~~ ORDER FOR
 BRIEFING SCHEDULE ON
 UNOPPOSED MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT**

1 Plaintiffs Kimberley Main, Robin Nelson, Marylynn Grikavicius, and Lourdes R.
 2 Landeros ("Plaintiffs") and Defendant Wal-Mart Stores, Inc. ("Wal-Mart" or "Defendant")
 3 (collectively, the "Parties") hereby enter into this stipulation to shorten the briefing schedule on
 4 an unopposed motion for preliminary approval of class action settlement ("Motion" or "Motion
 5 for Preliminary Approval"). Specifically, the Parties stipulate that the time be shortened for
 6 Plaintiffs to file their unopposed Motion from 35 days to 21 days before the hearing, and that the
 7 Motion shall be filed no later than October 26, 2012, for hearing on November 16, 2012, subject
 8 to Court approval.

9 RECITALS

10 **WHEREAS** on February 14, 2011, plaintiff Marylynn Grikavicius filed a putative class
 11 action complaint against Wal-Mart in the Superior Court of the State of California, County of Los
 12 Angeles, entitled *Marylynn Grikavicius v. Wal-Mart Stores, Inc., et al.*, Case No. BC454993,
 13 alleging violations of the Song-Beverly Credit Card Act of 1971, Cal. Civ. Code § 1747.08, *et*
 14 *seq.* (the "Grikavicius Action");

15 **WHEREAS** on February 24, 2011, plaintiff Lourdes Landeros filed a putative class
 16 action complaint against Wal-Mart in the United States District Court for the Central District of
 17 California, Case No. 2:11-01635-JSL-PJWx, alleging Wal-Mart violated the Song-Beverly Credit
 18 Card Act of 1971, Cal. Civ. Code § 1747.08, *et seq.* (the "Landeros Action");

19 **WHEREAS** on March 4, 2011, plaintiff Robin Nelson filed a putative class action
 20 complaint against Wal-Mart in the Superior Court of the State of California, County of San
 21 Francisco, entitled *Robin Nelson v. Wal-Mart Stores, Inc., et al.*, Case No. CGC-11-508950,
 22 alleging Wal-Mart violated the Song-Beverly Credit Card Act of 1971, Cal. Civ. Code § 1747.08,
 23 *et seq.* (the "Nelson Action");

24 **WHEREAS** on March 9, 2011, plaintiff Kimberley Main filed a putative class action
 25 complaint against Wal-Mart in the Superior Court of the State of California, County of San
 26 Francisco, entitled *Kimberley Main v. Wal-Mart Stores, Inc., et al.*, Case No. CGC-11-509011,
 27 alleging Wal-Mart violated the Song-Beverly Credit Card Act of 1971, Cal. Civ. Code § 1747.08,
 28 *et seq.* (the "Main Action");

1 **WHEREAS** on March 18, 2011, Wal-Mart removed the Grikavicius Action to the United
2 States District Court for the Central District of California, Case No. 2:11-cv-02314-RGK-VBKx;

3 **WHEREAS** on April 20, 2011, Wal-Mart removed the Main Action to the United States
4 District Court for the Northern District of California, Case No. 3:11-cv-01919-EMC;

5 **WHEREAS** on April 25, 2011, Wal-Mart removed the Nelson Action to the United
6 States District Court for the Northern District of California, Case No. 3:11-cv-2011-LB;

7 **WHEREAS** on April 28, 2011, the Main Action was reassigned to the Honorable
8 Jeffrey S. White, District Judge for the United States District Court for the Northern District of
9 California, for all further proceedings and designated as Case No. 3:11-cv-01919-JSW;

10 **WHEREAS** on May 16, 2011, the Nelson Action was ordered related to the Main Action
11 and reassigned to the Honorable Jeffrey S. White for all further proceedings;

12 **WHEREAS** on June 20, 2011, the Landeros Action was ordered related to the Main
13 Action and reassigned to the Honorable Jeffrey S. White for all further proceedings;

14 **WHEREAS** on July 20, 2011, the Grikavicius Action was ordered related to the Main
15 Action and reassigned to the Honorable Jeffrey S. White for all further proceedings;

16 **WHEREAS** on November 28, 2011, the Honorable Jeffrey S. White entered an order
17 consolidating the Main Action, Nelson Action, Landeros Action and Grikavicius Action for all
18 purposes as *Kimberley Main v. Wal-Mart Stores, Inc., et al.*, Case No. 3:11-cv-01919-JSW (the
19 "Consolidated Action");

20 **WHEREAS** on December 8, 2011, plaintiffs Kimberley Main, Robin Nelson, Marylynn
21 Grikavicius and Lourdes Landeros filed a Consolidated Complaint in the Consolidated Action
22 alleging Wal-Mart violated the Song-Beverly Credit Card Act of 1971, Cal. Civ. Code § 1747.08,
23 *et seq.* Plaintiffs Main, Nelson, Grikavicius and Landeros sought redress on their own behalf and
24 on behalf of other similarly situation consumers in California as a class action;

25 **WHEREAS** on December 27, 2011, Wal-Mart filed its Answer to the Consolidated
26 Complaint;

27 **WHEREAS** on April 4, 2012, plaintiff Tiffany Heon filed a putative class action
28 complaint against Wal-Mart in the United States District Court for the Northern District of

California, entitled *Tiffany Heon v. Wal-Mart Stores, Inc., et al.* (Case No. 3:12-cv-01681-MEJ), alleging Wal-Mart violated the Song-Beverly Credit Card Act of 1971, Cal. Civ. Code § 1747.08, *et seq.* (the "Heon Action");

WHEREAS the Parties engaged in arms-length negotiations, and on April 16, 2012, they participated in an all-day mediation conducted by The Honorable Edward A. Infante (Ret.) during which a settlement was reached as to all material terms on class benefits and notice;

WHEREAS on July 27, 2012, the Court entered an order relating the Heon Action to the Consolidated Action;

WHEREAS on September 13, 2012, the Court scheduled the hearing for Plaintiffs' unopposed motion for preliminary approval of the settlement on November 16, 2012 at 9:00 a.m. and ordered that the unopposed Motion for Preliminary Approval of the Settlement be filed on or before October 12, 2012;

WHEREAS Plaintiffs request additional time to prepare the Motion for Preliminary Approval because it has taken longer than anticipated to secure the necessary final approvals of certain material terms of the settlement;

WHEREAS the Parties anticipate that a finalized settlement agreement will be circulated among the Parties for signature on or before October 15, 2012; and

WHEREAS the Parties have agreed to shorten the time for hearing and have agreed that Plaintiffs' Motion may be filed no later than Friday, October 26, 2012.

NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE as follows:

Plaintiffs shall have until October 26, 2012 to file their Motion, which will be heard on ~~November 16, 2012.~~ December 7, 2012.

IT IS SO STIPULATED.

DATED: October 10, 2012

STONEBARGER LAW, APC

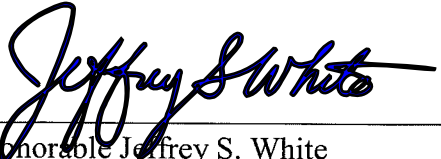
By: /s/ Gene J. Stonebarger

Gene J. Stonebarger
Interim Co-Lead Counsel

~~PROPOSED~~ ORDER

PURSUANT TO THE ABOVE STIPULATION, IT IS ORDERED that the deadline for Plaintiffs to file their unopposed Motion for Preliminary Approval of Class Action Settlement is continued to ~~October 26, 2012.~~ December 7, 2012 at 9:00 a.m.

Dated: October 12, 2012


The Honorable Jeffrey S. White
United States District Judge